


**BACKGROUND INFORMATION DOCUMENT
(BID)**



**RENEWAL OF ENVIRONMENTAL CLEARANCE CERTIFICATE
CHARCOAL PROCESSING PLANT IN ARANDIS, ERONGO
REGION**

April 2024

UNOO
INVESTMENTS

DOCUMENT INFORMATION AND APPROVAL		
Title	Background Information Document for the establishment of a charcoal processing plant in Arandis	
ECC Application Reference number	APP-001118	
Activity	Activity 9: Hazardous substance treatment, handling and storage	
Location	Arandis Town Lands Erf number 1305 (industrial property)	
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¹ BID to be approved by the Client as certification that the information contained herein is correct

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SECTION 1

1. INTRODUCTION

Uno Investment cc, a Namibian company, established a charcoal processing facility that is located in Arandis Town. Charcoal being a product that is demanded by the international market, Arandis town is identified to be strategically situated as it is close to Walvis Bay Harbour which a strategic exit port to global markets.

The Environmental Management Act (Act No. 7 of 2007, also known as the EMA) and EIA Regulations (Government Notice No: 30, 2012), classifies activities (known as listed activities) that may not be undertaken without an Environmental Clearance Certificate (ECC). This implies that an Environmental Impact Assessment (EIA) should be undertaken and an Environmental Management Plan (EMP) should be developed, and should be submitted to the Ministry of Environment and Tourism (MET) as part of the application for an Environmental Clearance Certificate (ECC).

Before construction of the charcoal processing facility, Unoo Investment enlisted an environmental assessment practitioner who developed the requisite EIA and obtained the ECC in October 2020. The validity period for the ECC is only three years, meaning a renewal is required from the competent authority. The purpose of this Background Information Document (BID) is therefore to provide a full description of the activities associated with the charcoal processing facility and environmental mitigation measures that should be implemented.

1.1 BID Objectives:

- Provide a description of the charcoal processing, the site where activities will be undertaken and location.
- To ensure that the project information provided by the client is complete
- Key aspects pertaining to the EIA are identified and raised early on by the Environmental Assessment Practitioner (EAP), the Competent Authority and I&AP's
- The BID provides the index for the EIA Scoping Exercise and EMP (similar to dichotomous keys). In other words, what is important, what should be assessed and how it should be assessed.
- Identifies the laws and guidelines that have been considered in the assessment and preparation of the reports.

1.2 Project Rationale and Motivation

It is estimated that approximately 26 million hectares, located in the north-central and central regions, are covered by encroacher bush (De-bushing Project, 2017). This phenomenon sees indigenous thorny bush and shrub species growing in such abundance that it increasingly suppresses the growth of grass, reduces biodiversity, and impacts the penetration of rainwater required to recharge underground water resources. With reference to ‘the Forestry and Environmental Authorisations Process for Bush Harvesting Projects’ (MAWF & MET, 2017), *“Namibia used to be a land of open savannas. Now, more than half of the country is covered by thorny and impenetrable bush, greatly reducing the productivity of our land. As well as decreasing the carrying capacity of rangelands, encroacher bush also has a catastrophic effect on Namibia’s water resources, drastically decreasing water inflow into underground reserves. For these reasons, the Government of Namibia has committed itself to combat bush encroachment so that our rangelands can be restored”*.

The agricultural sector has the potential to increase economic production provided that extensive thinning of encroacher bush is implemented. When encroacher bush has become so dense that grazing resources are seriously reduced, then the bush problem cannot be reversed without active intervention. The introduction of income-generating activities such as charcoal production turns the negative results of bush fighting into an economically viable practice for farmers. A core analysis suggests that by-products from bush such as charcoal forms part of an economically sustainable process to combat unwanted bush in Namibia.

The production of charcoal is an important activity for managing bush encroachment in Namibia, with an estimated 160,000 tons of export volumes annually. Charcoal production in Namibia is more dynamic than in other contexts as it presents strategies to combat bush encroachment, supplement farming income, and contribute to employment creation. This industry experienced an unprecedented boom with a growth of 42 percent in tonnages. The charcoal industry provides jobs to over 15 000 workers and contributes to the country’s GDP. The market for charcoal is established both at the national and international level. The affected farmers however need to establish a network to access such markets, Uno Investments has therefore secured international markets to supply processed charcoal from Namibia.

The charcoal is sourced from identified farms in central and eastern Namibia that are affected by bush encroachment. The processing plant is in Arandis because of its suitable locality in relation to access to the harbor in Walvis Bay for export purposes.

SECTION 2

2. PROJECT DESCRIPTION

2.1 Project Framework

Farmers that are affected by bush encroachment use mechanical approaches to clear the problem bush. The farm laborers chop the trees and burn it up in churns to produce charcoal. This charcoal is then collected by charcoal processors as per pre-arrangements with farm owners. Unoo Investments has entered into such agreements with several farms spanning from Omaheke to Oshikoto regions. Collection of charcoal from the respective farms is done on a weekly basis depending on availability and transported to the processing facility in Arandis.

2.2 Project Location

Arandis is located about 100 kilometers north of Walvis Bay town along the B2, in the Erongo Region. The charcoal processing plant will be established on an industrial property, Erf number 1305 which covers 10 500m². The land is already serviced and is connected to municipal services (see attached map).

Erongo Region covers an area of 63 586km², which comprises 7.7% of Namibia's total area. In 2023, a total of 240 206 people were confirmed to reside in Erongo Region and 13 542 people reside in Arandis. The table below presents population distribution across the region.

Erongo	240 206	122 322	117 884
Arandis	13 542	6 961	6 581
Daures	14 601	8 061	6 540
Karibib	19 705	10 394	9 311
Omaruru	13 322	6 916	6 406
Swakopmund	75 921	37 950	37 971
Walvis Bay Rural	51 497	25 828	25 669
Walvis Bay Urban	51 618	26 212	25 406

Figure 1: Population distribution in Erongo Region sex disaggregated (NSA, 2024)

2.3 Socio-economic Development

The mining sector in Erongo Region is characterized by the establishment and expansion of a number of uranium mines in recent years due to an increased demand for this energy source. Mining and quarrying contribute about 8.8% to national GDP.

Arandis has been referred to as the Uranium capital of world owing to its proximity (15 km) to Rossing Uranium Mine which has the largest open-pit uranium mine. The town of Arandis has a population of approximately 13 542 inhabitants, most of whom are affiliated to the uranium mining activities in the surrounding. Besides Rossing Uranium Mine, Arandis also serves the Husab and Trekkopje uranium mines. The town has a generally high population of young adults owing to the campus for Namibia Institute of Mining and Technology (NIMT) that provides technical skills to industrial workers. The proposed charcoal plant is expected to contribute towards economic progression in the town through job creation for the locals.

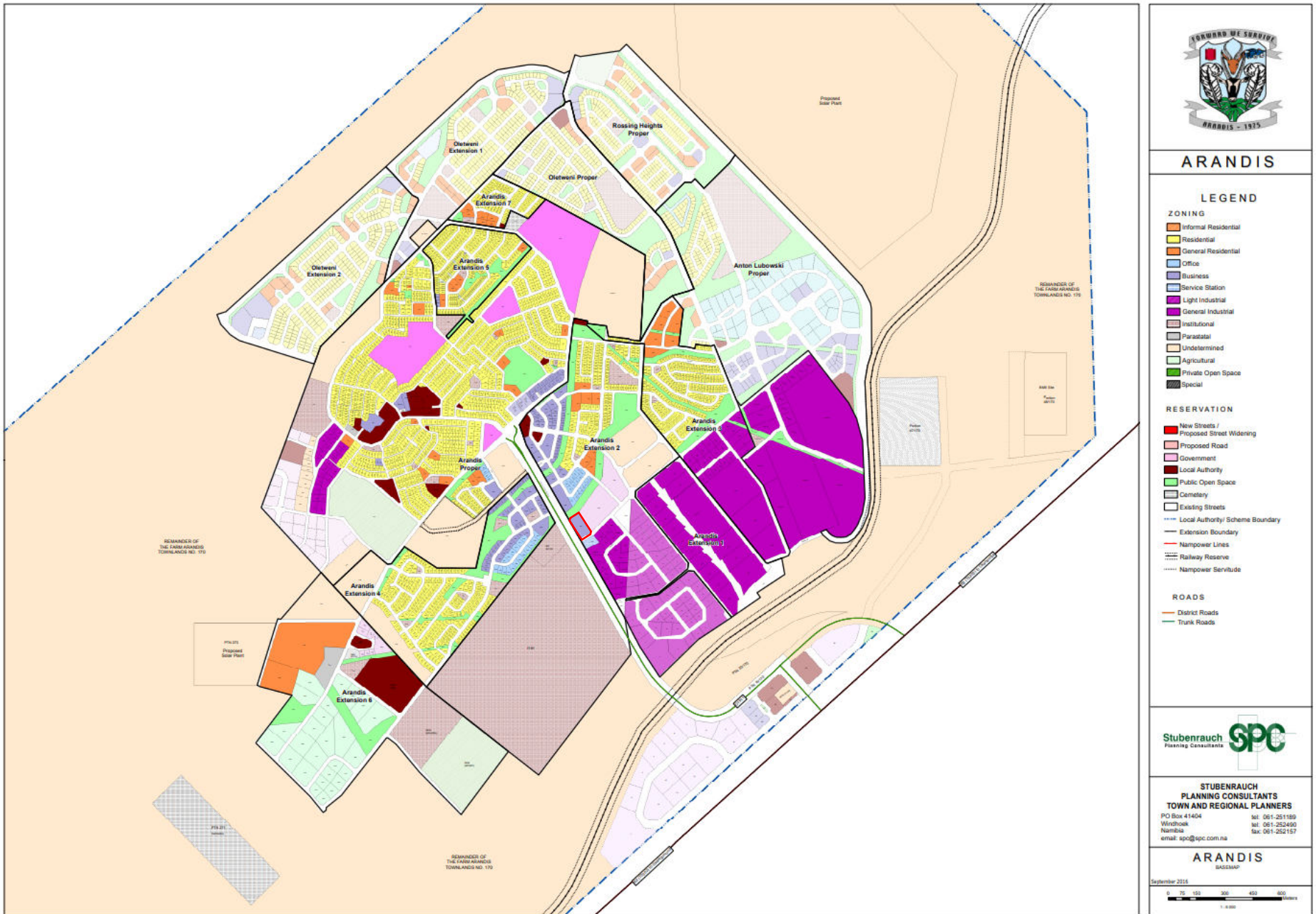


Figure 2-2 Project Location – Erf 1305 (red rectangle) in Arandis townlands, already zoned as Industrial.

SECTION 3

3. LEGAL FRAMEWORK

3.1 Environmental Requirements under the Environmental Management Act

3.1.1 Environmental Management Act (No.7 of 2007)

The Environmental Management Act (also referred to as the EMA), stipulates that for each developmental project, which is listed under the EIA regulations, an Environmental Impact Assessment (EIA) should be conducted.

The aim of the EIA is to identify, assess and ascertain potential environmental impacts that may arise from the proposed activity. According to the EMA, an EIA is a process of identifying, predicting, interpreting and communicating potential impacts to interested and affected parties (I&APs).

The charcoal processing facility triggers some listed activities in terms of the Environmental Management Act no. 7 of 2007 and the Environmental Impact Assessment Regulations of 6 February 2012. Table 1 below presents the specific listed activities. An Environmental Clearance Certificate (ECC) which was issued in October 2020 has since expired and a renewal is required to ensure continuity of the operations.

3.1.2 Listed Activities

Table 3-1: List of Triggered Activities concerning the proposed development

Activity	Description of the Activity	Operation of the Activity
Activity 9 Hazardous substance treatment, handling and storage	9.1 The manufacturing, storage, handling or processing of hazardous substance defined in the Hazardous Substances Ordinance, 1974. 9.2 Any process or activity which requires a permit, license or other form of authorization, or the modification of or changes to existing facilities for any process or activity which requires an amendment of an existing permit, license or authorization or which requires a new permit, license or authorization in terms of a law governing the generation or release of emissions, pollution, effluent or waste.	The process in handling charcoal is a hazardous activity. Therefore precautionary measures have to be in place such as protective gear and safe handling practices on site.

Although Unoo Investments will only be sourcing the charcoal from farmers that will need to obtain the necessary harvesting permits from the Ministry of Agriculture, Water and Land Reform (MAWLR). It is imperative that surety is ascertained with the farmers to avoid illegal activities. Unoo Investments is already a custodian of additional permits as listed below (Table 2) to ensure that

they are able to export the processed charcoal. The company is also certified in accordance with the requirements of the Forest Stewardship Council; and is licensed to use the FSC Logo on its products because the charcoal that it processes is sourced from farms that use sustainable means to harvest the charcoal.

Table 2: Permit requirements from the Ministry of Agriculture, Water and Forestry

Legal instrument	Activity to be undertaken
Forest Act (2001) and Regulations (2015)	Administered the Directorate of Forestry, the act governs activities which takes place classified forests and non-classified forest areas.
Transport Permit	A Transport Permit is required to convey any wood or wood products (e.g. droppers, planks, charcoal, and firewood). It is obtainable from any Forestry Office and is valid for 7 days.
Export Permit	An Export Permit is required to send any wood or wood products outside Namibia. It is obtainable from any Forestry Office and is valid for 7 days.
Marketing Permit	A Marketing permit is required to enable the producer to sell his/her products to any other party. The permit is valid for 3 months in commercial areas while in communal areas the permit is valid for 1 month only.

3.2 Environmental Management Plan (EMP)

In-addition to the EIA, the EMA states that for each activity undergoing an EIA process, an Environmental Management Plan (EMP) should be developed. The EMP outlines mitigation measures against specific steps, stages or processes of the proposed development. Thus, the EMP can be defined as the tool used to prevent / minimize the impacts identified during the EIA process. For accountability, the EMP outlines specific roles and responsibilities for the role-players, and non-compliance is punishable.

SECTION 4

4. THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

An EIA is a process that evaluates the likely environmental and social effects of a proposed project or development, which identifies suitable mitigation for to avoid or minimize the predicted impacts. The envisioned EIA process will be undertaken in a holistic approach encompassing different elements as shown in figure 5.

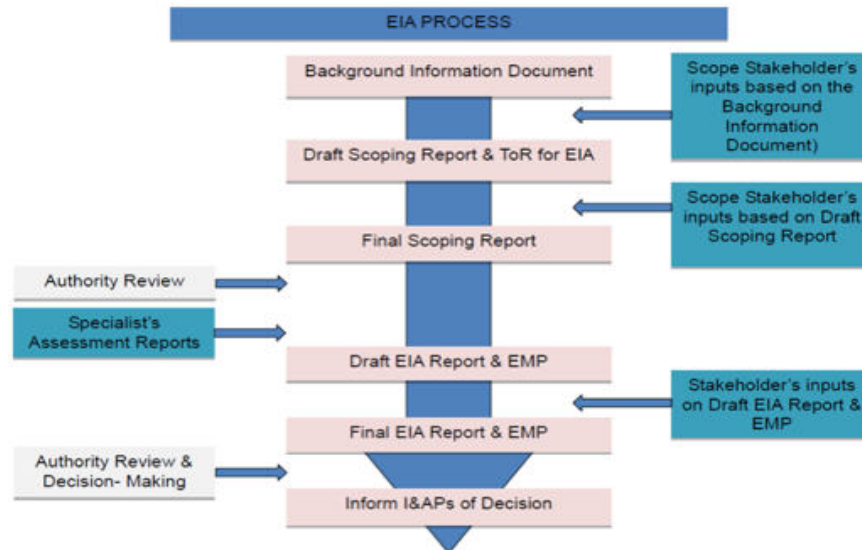


Figure 4-1: The EIA process

EMA also stipulates that for each activity undergoing an EIA process, an Environmental Management Plan (EMP) should be developed. The EMP outlines mitigation measures against specific steps, stages or processes of the proposed development. Thus, the EMP can be defined as the tool used to prevent / minimize the impacts identified during the EIA process. For accountability, the EMP outlines specific roles and responsibilities for the role-players, and non-compliance is punishable.

4.1 Special considerations and studies

The design of the processing plant

Charcoal is a product that is dust intensive and if not properly handled, can lead to serious health consequences. The facility therefore needs to be constructed in a manner that will not result in excess dust generation as the activities are undertaken. The design of the facility should therefore be cognizant of minimizing dust emissions.

SECTION 5

5. STAKEHOLDERS CONSULTATION

5.1 Requirements

As stipulated in the EIA Regulations (paragraphs 7 and 21), public consultation is a pre-requisite and forms an integral component of the EIA. Comments made during the consultation should be properly captured and addressed in both the EIA Scoping Report and EMP respectively.

5.2 Purpose and Process

Engaging and consulting with the public (residents, authorities etc.) and organizations that may be affected by or interested in the operation of the charcoal processing facility; allows for all parties to be informed of the proposals and provides an opportunity for views, opinions and concerns to be registered. Public participation was undertaken during the initial project proposal stage and development of the requisite environmental scoping report. Various I&APs inclusive of representatives from Arandis Town Council were identified and consulted to solicit input. The stakeholder's consultation meeting was convened on 23 January 2020 at Arandis Town Hall.



Figure 2: The venue in Arandis where the public meeting was convened